

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

<b>STEPHEN MELISE,</b> <b>Plaintiff</b>	:	
	:	
	:	
<b>v.</b>	:	<b>C.A. No.: 1:17-cv-00490-MSM-PAS</b>
	:	
<b>Coyne-Fague, et al.</b>	:	
<b>Defendants</b>	:	

**STIPULATION TO AMEND SCHEDULING ORDER**

By agreement of the parties, Plaintiff and Defendants hereby move to amend the scheduling order by extending the factual discovery closure date by sixty (60) days from the dates established in the pre-trial scheduling text order dated November 7, 2019 up to and including **February 28, 2020**, all expert discovery dates to be extended by the same, and that all pre-trial deadlines be extended by the same accordingly.

As grounds for this assented motion and in support thereof, the parties aver as follows. Additional paper discovery was requested by Plaintiff pursuant to deposition testimony and responses from Defendants are still outstanding. The parties require additional time to respond to and review responses to those requests.

For all the foregoing reasons, Plaintiff and Defendants believe that the additional time requested is necessary to resolve the remaining discovery issues and conduct any additional factual discovery that may be necessary as a consequence thereof. As such, the parties respectfully request that this motion be granted.

Plaintiff,  
By his attorney,

State Defendants  
By their attorney,

/s/ Chloe A. Davis  
**Chloe A. Davis, Esq.** Bar No. 9334  
Sinapi Law Associates, Ltd.  
2374 Post Road, Suite 201, Warwick, RI 02886  
Phone: (401) 739-9690  
Email [cad@sinapilaw.com](mailto:cad@sinapilaw.com)

/s/ Justin J. Sullivan  
**Justin J. Sullivan, Esq.** (#9770)  
RI Office of Attorney General  
150 S. Main Street, Providence RI 02903  
(401) 274-4400  
[jjullivan@riag.ri.gov](mailto:jjullivan@riag.ri.gov)

Defendants Vohr and Clarke  
By their attorney

/s/ Jeffrey G. Latham  
Jeffrey G. Latham, Esq. (#6264)  
Tate & Latham, LLC  
40 Westminster Street, Suite 350  
Providence, RI 02903  
(401) 421-7400  
jlatham@tatelawri.com

**CERTIFICATION**

Jeffrey G. Latham, Esquire  
Christine A. Stowell, Esquire  
Tate & Latham  
40 Westminster Street, Suite 350  
Providence, RI 02903  
(401) 421-7400  
[jlatham@tatelawri.com](mailto:jlatham@tatelawri.com)  
[cstowell@tatelawri.com](mailto:cstowell@tatelawri.com)

Justin J. Sullivan, Esquire  
Lauren E. Hill, Esquire  
Department of the Attorney General  
State of Rhode Island  
150 South Main Street  
Providence, RI 02903  
401-274-4400  
[jisullivan@riag.ri.gov](mailto:jisullivan@riag.ri.gov)  
[lhill@riag.gov](mailto:lhill@riag.gov)

I hereby certify that on **December 30, 2019**, a true copy of the within was filed electronically via the Court's CM/ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and the filing is available for viewing and downloading from the Court's CM/ECF System. Service on the counsel of record listed above has been effectuated by electronic means.

/s/ Chloe A. Davis